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Joseph E. Samora, Jr.
Treasurer
1001 G Street, NW
Suite 100 East
Washington, DC 20001

September 20, 2000

Mr. Scott Walker
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Case Corporation Excellence
in Government Committee
FEC ID# CD0303883
Mid-Year and Year End Reports
for 1999 and February, April,
May, June 2000 Monthly Reports

Dear Mr. Walker:

This is in response to your September 15, 2000 letter regarding the manner in which payroll deductions are reported on Schedule A of the PAC's FEC Report. Public Affairs Support Services, Inc. (PASS) provides assistance to Case Corporation Excellence in Government Committee and prepares the FEC reports for the above referenced PAC.

Your letter indicates that there may be some confusion in the way you are interpreting the PAC's Schedule A supporting Line 11(a)(i). As noted on Schedule A, the PAC receipts with the notation "Payroll Deduction" are in fact collected through a payroll deduction plan. Please accept the following explanation of why the PAC does not use the suggested payroll deduction reporting method illustrated in the "FEC Campaign Guide for Corporations and Labor Organizations."

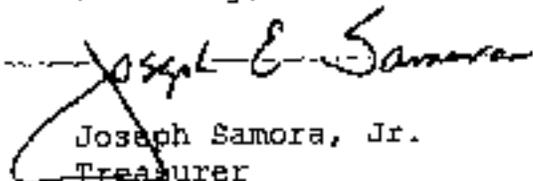
Currently the PAC collects contributions from all of its payroll deduction participants twice a month; however, this may not always be the case. Additionally while most contributors now are donating a set amount to the PAC at each deduction, the amount each individual contributes per pay period can vary if it is based on a percentage of pay which can change frequently due to pay increases or voluntary changes in the contributor's deduction. When the deduction per period fluctuates in such a way, it would be difficult to accurately display an aggregate amount for the reporting period and then show the amount deducted per payroll period. Such a method would result in an "average" per pay period, not an actual amount per pay period, which would be incorrect. Further, these averages could be fractions of a cent, which is also impossible under our nation's currency.

Mr. Scott Walker
September 19, 2000
Page Two

For these reasons, the PAC has chosen for several years to report each individual deduction on its computerized receipt schedules, approved by the Commission. To be in full compliance with the requirements of the Federal Election Campaign Act, the PAC discloses the full name, address, occupation and employer of each contributor, the date of each payroll contribution and the amount of each payroll contribution. For further clarification, the schedule notes whether the contribution was made via payroll deduction or a personal check. The aggregate year-to-date total of the contributions of each PAC participant is also disclosed.

I hope this explanation clarifies the methodology used by the Case Corporation Excellence in Government Committee in disclosing its receipts in the past. Please keep this letter on file for future reference when you are reviewing the PAC's reports. However, it should be noted that the PAC began filing FEC reports electronically beginning with the September Monthly report. If you have any questions or need any additional information, please feel free to call me at (202) 737-7575.

Sincerely,



Joseph Samora, Jr.
Treasurer
Case Corporation Excellence
in Government Committee

cc: Public Affairs Support Services, Inc.

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

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